

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NATIONAL MANAGEMENT &
PRESERVATION SERVICES, LLC, d/b/a
NATIONAL FIELD NETWORK,

Debtor.

Case No. 18-16859 (CMG)

Chapter 7

Honorable Christine M. Gravelle,
Chief U.S.B.J.

Hearing Date and Time:
August 5, 2025, at 10:00 a.m.

**NOTICE OF MOTION OF ANDREA DOBIN, CHAPTER 7
TRUSTEE, FOR ENTRY OF ORDER APPROVING SETTLEMENT
AND COMPROMISE WITH PROPERTY MANAGEMENT, INC.
PURSUANT TO 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 9019
AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that on the **5th day of August, 2025, at 10:00 a.m.**, or as soon thereafter as the movant may be heard, Andrea Dobin, Chapter 7 Trustee (the “**Trustee**”) in the bankruptcy proceeding of National Management & Preservation Services, LLC, d/b/a National Field Network, Chapter 7 debtor, shall move before the Honorable Christine M. Gravelle, Chief United States Bankruptcy Judge at the United States Bankruptcy Court, U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order approving the settlement and compromise reached between the Trustee and Property Management, Inc. pursuant to Section 105(a) of the Bankruptcy Code and Fed. R. Bankr. P. 9019 (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Trustee will rely upon her Certification and Memorandum of Law filed in support of the relief requested.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-1.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that an Order granting the relief requested herein is submitted herewith and made part of the Motion herein.

**McMANIMON, SCOTLAND &
BAUMANN, LLC**
*Counsel to Andrea Dobin,
Chapter 7 Trustee*

By: /s/ Michele M. Dudas
MICHELE M. DUDAS

Dated: July 7, 2025